



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

RMT:SA
F. #2012R01574

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 21, 2016

By Hand and ECF

Honorable John Gleeson
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Ahmed et al.
Criminal Docket No. 12 CR 661 (S-1)(JG)

Dear Judge Gleeson:

The government writes respectfully, with consent of defendants Ahmed and Yusuf, to request that the Court enter the proposed orders of judicial removal, attached hereto. As the Court is aware, in connection with the defendants' plea agreements, the defendants both have consented to their removability from the United States and the entry of such orders. Copies of the defendants' signed plea agreements and the defendants' plea statements in support of judicial removal are also provided for the Court's consideration.

Additionally, the government advises that, upon the entry of the orders of judicial removal it intends to formally move to dismiss any open counts and any underlying indictments remaining as to both defendants Ahmed and Yusuf.

Respectfully submitted,

ROBERT L. CAPERS
United States Attorney

By: /s/
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(enclosures)

cc Clerk of Court (JG)
Counsel of record, via email and ECF